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June 27, 2003

Docket Management
Room PL-401
400 Seventh Street, SW
Washington, DC 20590

Re: U. S. DOT Docket Number NHTSA-2003-14375 - 19

Dear Sir or Madam:

The American Motorcyclist Association (AMA) is a national not-for-profit, 265,000-member organization with an unparalleled history of pursuing, protecting and promoting the interests of the world's largest and most dedicated group of motorcycle enthusiasts. Founded in 1924, the AMA exists to further the interests of American motorcyclists, while serving the needs of its members.

We write today to comment on the proposed NHTSA *Characteristics of Motorcycle Operators* survey as published in the Federal Register on April 29, 2003.

Overall, the AMA is concerned the proposed survey will not accomplish its stated goal. Additionally, we are concerned about possible use of the survey findings in future efforts by the NHTSA to reduce motorcycle crashes.

The AMA is concerned with the following:

- the survey focus is not clear, particularly with regard to its emphasis on older riders. While recent data from the NHTSA's National Center for Statistics and Analysis indicate an increase in the number of older riders involved in motorcycle crashes, we do not believe the proposed survey will provide significant information to clarify the causes of crashes involving older riders.
- the proposed survey venues will not provide a representative cross sample of today's motorcyclists. Without a better understanding of the demographics of motorcycle owners and operators who typically attend motorcycle events, races, and gathering sites, the proposed survey is likely to miss critical portions of the motorcycling community.
- face-to-face interviews will not provide unbiased information because motorcyclists often mistrust government-sponsored information gathering efforts. Once the purpose of the survey is revealed by the interviewer, we expect this

- mistrust to surface in the answers provided by many participants. In particular, some number of motorcyclists will respond in a manner designed to mislead the interviewer and therefore negatively influence the survey results. We do not expect the interviewers will receive a warm welcome at many of the events and activities.
- the proposed length of the interview, and the expected additional time required once a crash-involved motorcyclist is identified, will reduce participation. Motorcyclists attend rallies, races, and riding activities to interact with fellow motorcyclists, not stand around and answer probing, personal questions regarding their background, experience, and lifestyle. Even if the interviewers are experienced motorcyclists, the necessary level of trust to facilitate the revelation of extremely personal information (some possibly embarrassing) will not likely be established between interviewer and interviewee.

While the AMA agrees with the need for scientific examination of motorcycle crashes and the factors contributing to them, we do not believe the proposed NHTSA

Characteristic of Motorcycle Operators survey is the correct approach. Without the completion of an updated, comprehensive motorcycle crash causation study, sampling of motorcyclist behavior, attitudes, and experiences will yield yet another study without significance. We view the proposed survey as poor use of critical resources better spent on real research.

The last major comprehensive study of motorcycle crashes was undertaken in *Motorcycle Accident Cause Factors and Identification of Countermeasures* (a.k.a. the Hurt Report; DOT HS-805 862), published in January 1981. Information contained in the Hurt Report directly lead to motorcycle safety and education programs used throughout the country in an effort to reduce the number of crashes involving motorcycles.

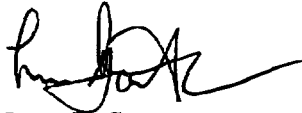
For years, the AMA has called for an updated, comprehensive motorcycle crash causation study. Recently, the AMA began a campaign to include funding for updated research into motorcycle crashes within the framework of the upcoming Transportation Equity Act of the 21st Century (TEA-21) reauthorization. Without benefit of such an updated study, surveys such as the proposed *Characteristics of Motorcycle Operators* are not able to focus on what truly matters with regard to motorcyclist behavior, attitudes, and experiences.

First things first: the AMA holds that precious resources should be focused on a comprehensive, in-depth motorcycle crash study before any other information gathering activities take place. We believe the information provided in such a comprehensive study would better direct future research and more closely focus attention on the true causes of motorcycle crashes. Only after the completion of such a study should face-to-face interviews be considered as one technique for a better understanding of the behaviors, attitudes, and experiences of motorcycle owners and operators.

In conclusion, the AMA does not believe the proposed collection of information is necessary for the proper performance of the functions of the NHTSA. We cannot support the proposed the NHTSA *Characteristics of Motorcycle Operators* survey and therefore recommend the proposed survey be withdrawn from further consideration.

Thank you for the opportunity to provide our comments regarding the proposed survey. Please contact me if you require further information or have questions regarding our position in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Imre F. Szauter', with a stylized, flowing script.

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